

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

*Granted.
Haven L. Litkovitz
10/17/18*

TERRY COLLETT,

Plaintiff,

vs.

**HAMILTON COUNTY, OHIO
et al.**

Defendants.

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Case No. 1:17-cv-295

Magistrate Judge Litkovitz

**MOTION TO FILE EXHIBITS
UNDER SEAL**

Now come Defendants, by and through counsel, and hereby move the Court to permit the filing of six (6) exhibits – (1) Defendants Exhibit O; (2) Defendants Exhibit P; (3) Defendants Exhibit R; (4) Defendants Exhibit S; (5) Defendants Exhibit T; and (6) Defendants Exhibit U under seal in support of Defendants’ Motion for Summary Judgment which is due on October 29, 2018, for the reasons more fully set forth in the memorandum below.

MEMORANDUM

All of the exhibits listed above are confidential medical records of the Plaintiff which are subject to the protective order issued by the Court. (Doc.19). The exhibits are relevant to the Plaintiff’s claimed injuries and the Defendant’s defenses as to the extent and cause of same.

It would be difficult for the Court to evaluate the legal arguments to be made in Defendants’ Motion for Summary Judgment which are based on the facts set forth in these exhibits or for a fact finder to navigate through this information if the information was only